

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Robert Dedmon,	§	CIVIL ACTION NO.
Plaintiff,	§	4:21-cv-03371
	§	
	§	JUDGE CHARLES ESKRIDGE
vs.	§	
	§	Jury Demand
Shell Exploration &	§	
Production Company and	§	
Shell Trading Services	§	
Company,	§	
Defendants.	§	

PLAINTIFF ROBERT DEDMON'S EXHIBIT LIST

Robert Dedmon may offer or use any exhibit listed on Defendants' exhibit list.

No.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
	2014 qualifications				
	Dedmon resume [ShellDedmon 766-767]				
	Frnka LinkedIn profile [Dedmon 2832]				
	November 25, 2014 email Patrick Frnka steep learning curve [ShellDedmon 864]				
	2014 hiring process				
	January 17 & 22, 2014 emails [Williams, Dedmon] [Dedmon 762-763]				
	January 24, 2014 email invitation to apply for sales representative job 4089BR [Dedmon 811]				
	January 24 & 31, 2014 & February 3, 2014 emails [Williams, Dedmon] [Dedmon 827]				
	January 25, 2014 application acknowledgement [Dedmon 834]				

	February 2014 calendar [Dedmon 2830]				
	February 1, 2014 emails about initial teleconference on February 4 [Dedmon 849-854]				
	February 3, 2014 email string between Carl Williams and Robert Dedmon about phone interview with Shell—top 3 candidates [Dedmon 826]				
	February 6, 2014 email string between Kendra Williams and Robert Dedmon about job compensation transparency [Dedmon 855-861]				
	February 12, 2014 emails about February 18 interview [Dedmon 862, 833]				
	February 14, 2014 emails about sales representative job 4089BR [Dedmon 830-831]				
	February 19, 2014 post-interview email [Dedmon, Allie] [Dedmon 835]				
	March 2014 calendar [Dedmon 2831]				

	March 1, 2014 promotion that led to loss of JG5 position in Houston (duplicate in exhibit list) [ShellDedmon 705]				
	February 19, 2014 & March 13, 2014 emails [Williams, Dedmon] [Dedmon 805]				
	March 4, 2014 email from Robert Dedmon to Tyler Allie requesting update about job [Dedmon 829]				
	2014-03-14 email string between Carl Williams and Robert Dedmon about candidates for the job [Dedmon 803-809]				
	March 31, 2014 emails about downgrading JG and differential treatment based on race [Hartnett, Rangan, Bowman, Rozelle, Olmen] [ShellDedmon 706]				
	April 2-3, 2014 emails about JG downgrade [Hartnett, Rangan, Bowman, Rozelle, Olmen] [ShellDedmon 705]				
	April 15, 2014 emails transferring request to make job offer at JG5 [Olmen, Rangan, Rozelle] [ShellDedmon 813]				

	<p>April 17, 2014 email denying request to offer job at JG5 but agreeing to work with recruiting to keep candidate “warm” [Olmen, Rangan, Hartnett, Rozelle]</p> <p>[ShellDedmon 717]</p>				
	<p>April 22, 2014 email requesting to offer job at JG6 to Dedmon, with compensation competitive to skill set so possibly at higher end of pay range; again expresses discomfort over race differential [Rangan, Olmen, Hartnett, Rozelle, Bowman]</p> <p>[ShellDedmon 716]</p>				
	<p>April 22-23, 2014 email string, same subject but with April 23, 2014 promise to respond tomorrow [Olmen, Rangan, Hartnett, Foltz, Bowman]</p> <p>[ShellDedmon 722]</p>				
	<p>April 23, 2014 emails showing Shell excuse for job grade</p> <p>[Dedmon 766]</p>				
	<p>April 24, 2014 9:01 a.m. email Hartnett to Bowman, Rangan reiterating would like to offer power sale representative job to Dedmon; addresses qualifications and experience; attaches resume</p> <p>[ShellDedmon 726]</p>				

	<p>April 24, 2014 emails with false claims of lack of sales experience and questioning for the first time Dedmon's qualifications, Hartnett OMG response [Sutton, Olmen, Bowman, Rangan]</p> <p>[ShellDedmon 730-731, 725]</p>				
	<p>April 24-25, 2014 emails about qualifications; requesting interview and selection notes [Rangan, Olmen, Hartnett, Rozelle]</p> <p>[ShellDedmon 732]</p>				
	<p>April 25, 2014 email response showing Dedmon qualifications [Hartnett, Bowman, Sutton, Rangan]</p> <p>[ShellDedmon 735-736]</p>				
	<p>April 25, 2014 email string including response that HR has concerns about this particular candidate and will evaluate whether any offer is made at all</p> <p>[ShellDedmon 738]</p>				
	<p>April 29, 2014 email from Rangan about hire situation, no difference in job duties, and prior hires without direct sales experience</p> <p>[ShellDedmon 751]</p>				
	<p>May 1, 2014 Rangan email about EO report</p> <p>[ShellDedmon 753]</p>				

	May 12, 2014 Olmen email about EO report and belief she was following policy [ShellDedmon 802]				
	May 19, 2014 emails about posting JG6 job as new position, though tasks are the same [Shell Dedmon 758, 768]				
	June 4, 2014 Rangan email about pending EO investigation [ShellDedmon 778]				
	June 19-20, 2014 emails about re-applying for sales representative, again shows Shell excuse for job grade [Dedmon 838-840, 841-848]				
	June 22, 2014 emails inviting Dedmon to apply for sale representative job 8401BR [Dedmon 810]				
	June 30, 2014 email interview that afternoon [Dedmon 832-833]				
	July 9, 2014 emails with benefits attachments, question about sign-on bonus [Dedmon 798]				

	July 9-10, 2014 emails about sign on bonus and hard copy of offer letter [Dedmon 801]				
	July 11, 2014 welcome emails after (oral) employment acceptance [Dedmon 479-480]				
	July 11, 2014 Shell Exploration & Production Company conditional employment offer signed July 13, 2014 [ShellDedmon 113-116]				
	July 11, 2014 email about “regret” for sales representative job 4089BR [Dedmon 803]				
	July 24, 2014 pre-employment screening cleared, start date August 19, 2014 [Dedmon 769]				
	August 7, 2014 email confirming offer of employment, start date August 19, 2014, need to complete new hire paperwork [Dedmon 792]				
	2014 JG5-6 pay ranges [ShellDedmon 64]				
	Teri Ramsey (Olmen) LinkedIn profile [Dedmon 2827-2828]				

	2015				
	February 10-11, 2015 emails about power sales position [ShellDedmon 849-857]				
	February 19, 2015 emails about power sales position [ShellDedmon 893]				
	February 21 2015 job grade transfer for Robert Dedmon [ShellDedmon 99-100]				
	2020 revelation and prompt pursuit of rights				
	2020-06-07 text message from Sri Rangan to Robert Dedmon [Dedmon 2822]				
	October 16, 2020 charge of discrimination [ShellDedmon 65-67]				
	April 20, 2021 email sending 2014 JG5-6 pay ranges (duplicate on exhibit list) [ShellDedmon 64]				
	May 17, 2021 Shell's EEOC Position Statement [Dedmon 449-452]				
	May 17, 2021 Shell's EEOC Position Statement [Attachment B Anti-Harassment Policy for 2020] [Dedmon 404]				

	May 17, 2021 Shell's EEOC Position Statement [Attachment C 2015 Code of Conduct] [Dedmon 405-448]				
	2021 man down on team and need to fill spot				
	undated job broadcast form [ShellDedmon 1087-1093]				
	September 14, 2021 email from M. Tickle [ShellDedmon 1073]				
	pay disparities and damages				
	pay stubs ShellDedmon 1137 ShellDedmon 1615 ShellDedmon 2860 ShellDedmon 3659 ShellDedmon 1160 ShellDedmon 1660 ShellDedmon 2903 ShellDedmon 3700 ShellDedmon 1184 ShellDedmon 1707 ShellDedmon 2931 ShellDedmon 3742 ShellDedmon 1218 ShellDedmon 1776 ShellDedmon 2987 ShellDedmon 3808 ShellDedmon 1245 ShellDedmon 1464				

	ShellDedmon 1829 ShellDedmon 3032 ShellDedmon 3857 ShellDedmon 1272 ShellDedmon 1491 ShellDedmon 1882 ShellDedmon 3060 ShellDedmon 3910 ShellDedmon 1297 ShellDedmon 1516 ShellDedmon 1931 ShellDedmon 3965 ShellDedmon 1322 ShellDedmon 1541 ShellDedmon 1980 ShellDedmon 4010 ShellDedmon 4720 ShellDedmon 4722 ShellDedmon 4735 ShellDedmon 4727 ShellDedmon 4724 ShellDedmon 4719 ShellDedmon 4721 ShellDedmon 4733 ShellDedmon 4725 ShellDedmon 4723				
	Federal Rule of Evidence 1006 summary of pay differentials: Dedmon, Frnka, Kolkmann, Smith [Dedmon 2823]				
	Shell 2020 mid marketer organizational chart [ShellDedmon 1094]				

	performance reviews				
	2014-2023 performance reviews— Robert Dedmon [ShellDedmon 4292-4328]				
	2015-2023 performance reviews— Michael Deley [ShellDedmon 4329-4358]				
	2014-2023 performance reviews— Patrick Frnka [ShellDedmon 4359-4402]				
	2014-2023 performance reviews— Jennifer Hartnett [ShellDedmon 4403-4449]				
	2014-2023 performance reviews— Doug Hund [ShellDedmon 4450-4491]				
	2014-2023 performance reviews— Ryan Kolkmann [ShellDedmon 4492-4519]				
	2019-2023 performance reviews— Logan Luzzi [ShellDedmon 4520-4529]				
	2014-2020 performance reviews—Sri Rangan [ShellDedmon 4530-4555]				

	2014-2019 performance reviews— Patty Smith [ShellDedmon 4556-4598]				
	2014-2023 performance reviews— Susan Smith [ShellDedmon 4599-4637]				
	2014-2023 performance reviews— Michael Tickle [ShellDedmon 4638-4710]				
damages					
	2022-2023 Confidential medical records [Turner] [Dedmon2415-2436]				
	2023 Confidential medical records [Davis] [Dedmon 2437-2446]				
	April 10, 2023 Expert Disclosures [Jasmine Turner LPC Bio] [Dedmon 481-489]				
	April 10, 2023 Expert Disclosures [Anatomy of Anxiety graphic] [Dedmon 490]				
	April 10, 2023 Expert Disclosures [brain graphic] [Dedmon 491]				
	April 10, 2023 Expert Disclosures [labeled brain graphic] [Dedmon 492]				
	Headshot picture of Robert Dedmon [Dedmon 972]				

	Picture of Robert Dedmon at Shell [Dedmon 2823]				
	Robert Dedmon family pictures [Dedmon 1439-1465; 2824-2826]				
	Picture—international day for the elimination of racial discrimination [Dedmon 2829]				
	Shell policies				
	2001 Shell website policy—an inclusive workplace [Dedmon 1003-1006]				
	2005 Shell sustainability report [Dedmon 1014-1058]				
	2006 Shell sustainability report [Dedmon 1129-1173]				
	2010 code-of-conduct-english on 2014 website [Dedmon 201-240]				
	2010 diversity-inclusion brochure linked on the 2014 website [Dedmon 248-256]				
	2012 in review – numbers Royal Dutch Shell plc Sustainability Report on 2014-07 Shell website [Dedmon 257]				

	2012 Royal Dutch Shell plc Sustainability Report - Social data on 2014-07 Shell Website [Dedmon 259]				
	2014 Shell website entire_shell_sr13 [Sustainability Report] [No bates number]				
	2014 Shell Annual Report [Dedmon 1-200]				
	2014 Shell website eeoc gina supplement [Dedmon 241]				
	2014 Shell website eeoc self print poster [Dedmon 242-243]				
	2014 Shell website Trading - United States [Dedmon 244]				
	2014 Shell general business principles [Dedmon 1007-1013]				
	July 2014 Shell website - Our people - Shell Global [Dedmon 245-246]				
	July 2014 Shell website - Diversity and inclusion – our approach - Shell Global [Dedmon 247]				
	2015 Shell Code of Conduct English [Dedmon 260-303]				
	2015 Shell Annual Report [No bates number]				

	2020 Shell united states racial diversity equity and inclusion plan [Dedmon 312-314]				
	2016 Barnes v. Shell example of helpline complaint memo [Dedmon 1512-1518]				
	2020 Shell Website Race and Equity Combined Contents [Dedmon 315-319]				
	2020 Shell Annual Report [No bates number]				
	2020 Shell ethics and compliance manual [Dedmon 1059-1128]				
	2021 shell annual report [No bates number]				
	March 2021 Shell Global Helpline data privacy policy [Dedmon 1331-1335]				
	May 17, 2021 Shell's EEOC Position Statement [Attachment A EO Policy for 2020] (duplicate on exhibit list) [Dedmon 403]				
	May 17, 2021 Shell's EEOC Position Statement [Attachment B Anti-Harassment Policy for 2020] (duplicate on exhibit list) [Dedmon 404]				

	May 17, 2021 Shell's EEOC Position Statement [Attachment C 2015 Code of Conduct] (duplicate on exhibit list) [Dedmon 405-448]				
	2022 website shell global helpline [Dedmon 1226-1230]				
	2023 Shell website [de&i] [Dedmon 988-1000]				
	2023 Shell website [fair pay policy] [Dedmon 1001-1002]				
	February 2024 Shell website fact sheet [Dedmon 2820-2821]				
	Shell knowledge and history of discrimination				
	1996 nyt shell oil's own little problem [Dedmon 2410-2414]				
	2006 DOL press release re Shell E&P [Dedmon 2818-2819]				
	2012 harvard business school global diversity and Inclusion at Royal Dutch Shell [No bates number]				

	2014-2021 Shell EEO-1 Reports [Dedmon 973-987]				
	2017-10-27 Rodriguez v. Shell charge of discrimination [Dedmon 2714-2717]				
	2018 Shater Case Shell Oil EEOC Position Statement [Dedmon 320-343]				
	2020 Shell UK diversity-pay-gap-report [Dedmon 304-311]				
	2020-10-05 Shur v. Shell charge of discrimination [Dedmon 2718-2725]				
	2021 shell uk pay gap report [Dedmon 2759-2772]				
	July 16, 2021 Sheikh v. Shell charge of discrimination [Dedmon 2639-2644]				
	2021-09 oilman magazine gaurdie banister] [Dedmon 2374-2388]				
	2022 shell uk pay gap report] [Dedmon 2773-2793]				

	2023 shell uk pay gap report]				
	[Dedmon 2794-2817]				

Date: February 10, 2025

Respectfully submitted,

/s/ Amy Gibson

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